

Original

U.S. Department
of Transportation

United States
Coast Guard



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SEP 21 1995 2400 20 September 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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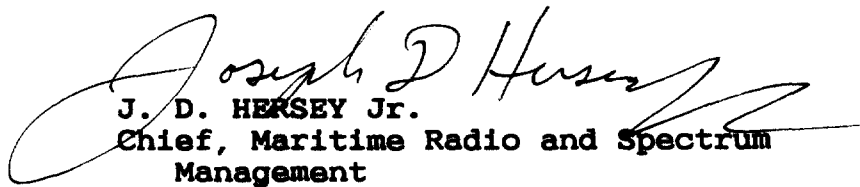
The Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Ref: PR Docket No. 92-257, Amendments of the Commission's Rules
Concerning Maritime Communications

Dear Mr. Secretary:

In accordance with Section 1.419 of the FCC Rules, enclosed are
an original and four (4) copies of United States Coast Guard
Comments in the above-captioned proceeding.

Sincerely,


J. D. HERSEY Jr.
Chief, Maritime Radio and Spectrum
Management
Telecommunication Management Division
By Direction

Enclosure: Comments of the United States Coast Guard

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**Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554**

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SEP 21 1995

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

In the Matter of)	
)	PR Docket No. 92-257
Amendments of the)	
Commission's Rules)	RM-7956
Concerning Maritime)	RM-8031
Communications)	RM-8352

COMMENTS OF THE UNITED STATES COAST GUARD

The United States Coast Guard (Coast Guard) respectfully submits the following Comments in response to the Further Notice of Proposed Rulemaking (Notice) in the above-captioned proceeding.

I. Section A. Digital Selective Calling.

On 23 June 1992, the Coast Guard petitioned the FCC to adopt this rule. We still support its adoption.

While we support the proposal that the minimum digital selective calling (DSC) requirements listed in Appendix B to the Commission's notice of proposed rulemaking be required for all maritime MF, HF and VHF radio transmitters manufactured in, or imported into, the United States, we note the following corrections to Appendix B (para. 10):

a. The column reference to Class C DSC is outdated. Class C is no longer recognized by the International Telecommunications

Union, and should be deleted from this Annex. Additionally, we are concerned that due to the technical limitations of Class C DSC, large scale availability of that type of DSC would lead to an excessive number of false distress alerts.

b. Since 1992, ITU-R Recommendation 493 has added three new classes of DSC: Class D, E and F. Class D and E generally exceed or meet the requirements of RTCM VHF SC101 and HF SC101, and are considered acceptable in meeting the requirements of this proposed rule. Class F, which does not provide for individual calls or routine calls, and cannot receive DSC calls other than acknowledgments to its own distress calls, does not meet the requirements of VHF SC101. We are concerned that Class F DSC radios would lead to an excessive number of distress and all-ships calls, and recommend it not be accepted under this rule.

c. The Radio Technical Commission for Maritime Services has clarified the requirements described in the columns "VHF SC101" and "HF SC101", without deviating from those requirements, in its document RTCM Paper 56-95/SC101-STD. We recommend that this document be incorporated into your rule by reference.

As a result of the time needed to issue this rulemaking, the compliance dates specified in the proposed rule are no longer reasonable. Consequently, we believe that a new date for radios manufactured in, or imported into, the United States be substituted for the proposed date 1 February 1997. We propose

that new date be sometime between two and three years after the date this rule is adopted in a report and order. The date for radios marketed or installed in vessels should be similarly delayed. Because Global Maritime Distress & Safety System-equipped vessels are allowed to cease guarding VHF channel 16 and 2182 kHz on 1 February 1999, a safety problem may occur if DSC-equipped radios are not generally available to non-compulsory vessels by that date. We urge the Commission to adopt this rule in time to meet that deadline.

II. Section E. Permissible communications.

While we have no objections to the Commission's proposal allowing public coast stations to use VHF maritime public correspondence channels to serve land vehicles on a secondary basis, we are concerned about the future availability of internationally-recognized VHF channels for maritime safety purposes. Except for some limited use on channel 20, these public correspondence channels are the only duplex channels in the VHF/UHF bands left in the U.S. which are internationally recognized and can be used to communicate with international vessels in our waters. We urge the Commission to safeguard these remaining Radio Regulation Appendix 18 channels.

III. Section F. Intra-service sharing.

We generally support the Commission's proposals for intra-service sharing, including the establishment of a new "Vessel operations" category to replace the existing commercial/noncommercial categories. We note in some regions that certain commercial vessels may need to retain one or more commercial channels for reasons of safety. To accommodate them, we propose that you give your Field Offices flexibility in establishing local advisory committees and authority to retain one or more commercial channels in those regions, based upon the recommendations of the advisory committee.

IV. Section H. Narrowband.

We continue to support narrowbanding the VHF marine band and look forward to further rulemaking toward this end. We recommend the Commission support narrowbanding efforts at the International Telecommunications Union Sector for Radiocommunications (ITU-R) and at the World Radio Conference (WRC) in 1997, and propose that proposed rulemaking be issued in this matter immediately after completion of WRC 97.

V. Section I. Maritime Mobile Sharing of Private Land Mobile Frequencies.

We fully support the Commission's proposal, noting that frequencies used by railroads also need to be protected. As noted above, Appendix 18 VHF spectrum is the only resource available for VHF communications with international shipping. We believe further sharing will be needed as means exist to protect other transportation users of the band.

VI. Section L. Ship-to-ship and ship-to-private coast station facsimile.

We support the Commission's proposal, and recognizing the need for expansion of this capability, believe that it should not be expanded throughout the rest of the U.S. until narrowbanding provisions described in Section H above are adopted. Data and voice usage cannot be used together easily on shared use channels, unless the data is very short duration (e.g. DSC) or can be transmitted in such a way as not to affect voice transmissions. We have no objection to transmission of data over non-safety voice channels in such a non-intrusive way. We also support setting aside one channel for shared data use, provided that a packet transmission arrangement can be made that would allow shared use of that channel.

VII. Section M. Other Issues.

The Commission proposed that ship station licenses automatically cover every type of emergency position-indicating radiobeacon (EPIRB), as well as MF, HF, VHF and radar frequencies available to recreational boaters (para. 45). We support that proposal. We also support the Commission's proposal concerning posting of licenses (para. 46). On a similar note, several recreational boaters have complained of confusion concerning the new regulatory fee policy, particularly concerning action needed when a boat is sold or replaced with a new boat, and how regulatory fee reimbursement should be claimed when a license is terminated early. We recommend the Commission prepare a public notice for boaters concerning this matter, and that a directory be included on the Commission's Internet server for public notices and similar information affecting the boating public.

VIII. Other Issues Requiring Consideration in this Further Notice.

In our 1992 petition to the FCC, we had asked that the rules be amended to limit digital selective calling use for unattended vessel monitoring. This rulemaking did not consider that request. However, the growing use of DSC on channel 70 for vessel dependent surveillance has increased the urgency for solving this matter. We ask the Commission to reconsider our proposal, repeated below:

"Using DSC for Unattended Vessel Monitoring

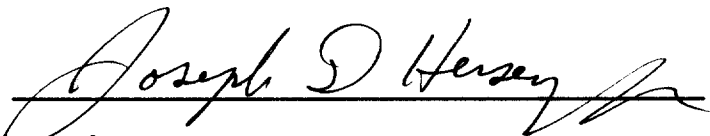
80.179(e) of the Commissions rules allow DSC on channel 70 to be used for unattended vessel monitoring. Since these rules were adopted, the GMDSS has come into force, using DSC on channel 70 for all routine distress and safety calling as well as for distress alerts. Additionally, the Coast Guard plans to use DSC on channel 70 for vessel traffic service dependent surveillance in accordance with recommendations of the International Radio Consultative Committee (CCIR) and the International Association of Lighthouse Authorities (IALA). For these reasons, it may be inappropriate to continue using DSC on channel 70 for unattended vessel monitoring in the future, in areas of significant DSC traffic. For this reason, we propose that 80.179(e) be amended as follows:

(1) The prohibition from transmitting DSC on channels other than 70 in 80.179(e)(7) is no longer appropriate and should be deleted. The transmitter inhibition requirement for channel 70 should be retained, however.

(2) Use of channel 70 for unattended vessel monitoring should be prohibited in vessel traffic service areas using channel 70 for dependent surveillance. The only VTS where DSC dependent surveillance is currently planned is Prince William Sound, Alaska, but expansion to other areas is likely. DSC is presently being used for this purpose in the ports of Valdez AK, Los Angeles/Long Beach CA, New York NY, and the St. Lawrence Seaway.

(3) Use of channel 70 for unattended vessel monitoring should also be prohibited in areas where CCIR recommendations on DSC channel loading are exceeded or are soon expected to be exceeded."

Respectfully Submitted,

A handwritten signature in cursive script, reading "Joseph D. Hersey, Jr.", written over a horizontal line.

Joseph D. Hersey, Jr.
Chief, Maritime Radio and Spectrum
Management
Telecommunications Management Division
By Direction of the Commandant

Commandant (G-TTM)
United States Coast Guard
Washington, D.C. 20593-0001

September 20, 1995